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VIA ECF

June 21, 2018

The Hon. Roslynn R. Mauskopf  
U.S. District Court Judge, E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Wexler v. Dorsey & Whitney LLP, 1:18-cv-3066 (RRM)

Dear Judge Mauskopf:

I write as counsel for both defendants in this case in response to the letter to Your Honor from plaintiff Shimshon Wexler filed earlier today requesting jurisdictional discovery.

I apologize for writing a second letter to the Court on the same day, but I believe it would expedite things and save judicial and party resources by my informing the Court that there are no partners of the defendant Dorsey & Whitney LLP with a residence in the State of Georgia, the domicile of plaintiff. If required, I would be prepared to file an affidavit to that effect. Accordingly, inasmuch as defendant Artin Betpera is a resident of the State of California, there appears to be complete diversity and no need for jurisdictional discovery.

Respectfully,

/s/ Jonathan M. Herman

cc: Shimshon Wexler, Esq.  
Krista E. Bolles, Esq.